

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

WILLIAM J. GAVIN,

Plaintiff,

V.

BULL HN INFORMATION  
SYSTEMS INC.,  
Defendant.

Civil Action No. 04-12207-GAO

**ASSENTED TO MOTION FOR ADDITIONAL TIME TO RESPOND  
TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Defendant filed a motion for summary judgment in the captioned action on May 31, 2006. Plaintiff's opposition to this motion is presently due on June 30, 2006. Plaintiff requests an extension until July 5, 2006 to file his opposition to the motion for summary judgment. As grounds for this request the undersigned states:

1. I have been working diligently to meet the June 30, 2006 deadline. However, today I have encountered numerous difficulties in scanning documents and converting them into the proper format to electronically file them with the Court. As a result the undersigned has not been able to complete the Memorandum in Opposition to the Motion for Summary Judgment.

2. It is anticipated that Plaintiff's Concise Statement of Disputed Material Facts together with the supporting exhibits will be electronically filed by the close of business today. However, the memorandum will not be competed for filing

electronically by the end of the day on June 30, 2006.

3. I have spoken with Defendant's counsel Mary Jo Harris, Esquire about this motion and she stated that Defendant assents to the granting of this motion.

For the foregoing reasons it is respectfully requested that the Plaintiff be granted additional time until July 5, 2006 to complete his filing of his opposition to Defendant's Motion for Summary Judgment.

Respectfully submitted,

**WILLIAM J. GAVIN**

By His Attorney,

s/Howard I. Wilgoren  
Howard I. Wilgoren,  
6 Beacon St., Suite 700  
Boston, MA 02108  
(617) 523 - 5233  
BBO No. 527840

Dated: June 30, 2006

#### CERTIFICATE OF SERVICE

I, Howard I. Wilgoren, certify that on June 30, 2006 the foregoing document was filed through the ECF system and a paper copy was sent to those indicated as non registered participants on the Notice of Electronic Filing on June 30, 2006. A courtesy copy of this document was sent to Defendant's Counsel Laurence J. Donoghue, Esquire Mary Jo Harris, Esquire, Morgan, Brown & Joy, 200 State Street, Boston, MA 02109 by facsimile transmission and by first class mail.

s/Howard I. Wilgoren  
Howard I. Wilgoren

Dated: June 30, 2006